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January 6, 2006

VIA ELECTRONIC SUBMISSION

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW – Lobby Level
Washington, D.C. 20554

Re: E911 Requirements for IP-Enabled Service Providers, WC Docket No. 05-196

Dear Ms. Dortch:

On behalf of AT&T Inc. (AT&T), I am submitting this letter detailing our compliance with the Commission's 911 requirements for interconnected Voice over Internet Protocol (VoIP) services, specifically AT&T CallVantage® Service,¹ per AT&T's October 7, 2005 *ex parte* letter² and the Commission's June 3, 2005 *VoIP 911 Order*.³

In its October 7, 2005 *ex parte*, AT&T explained the steps that it would undertake in the event that it was not able to provide E911 service to 100% of its customer base. As part of that filing, AT&T committed to stop accepting new customers in areas where it cannot provide E911 service, to make voluntary contributions to a public safety organization for grandfathered customers until AT&T can provide those customers with E911 connectivity, and to implement any new commercially reasonable technological solutions to expand its E911 footprint throughout the country.

AT&T is currently able to provide 911 service in full compliance with the rules established in the *VoIP 911 Order* for the substantial majority of its interconnected AT&T CallVantage Service VoIP customers.⁴ As of December 31, 2005, approximately 68% of

¹ AT&T CallVantage Service is actually provided to subscribers by an AT&T affiliate; for simplicity, however, in this letter, we refer to AT&T CallVantage as being provided by AT&T.

² See Letter from Robert W. Quinn, Jr., AT&T, to Marlene H. Dortch, Secretary, FCC, *IP-Enabled Services*, WC Docket No. 04-36, *E911 Requirements for IP-Enabled Service Providers*, WC Docket No. 05-196 (Oct. 7, 2005) ("AT&T October 7, 2005 *ex parte*").

³ *IP-Enabled Services*, WC Docket No. 04-36, *E911 Requirements for IP-Enabled Service Providers*, WC Docket No. 05-196, First Report and Order and Notice of Proposed Rulemaking, 20 FCC Rcd. 10245, ¶ 50 (2005) ("*VoIP 911 Order*").

⁴ Some AT&T CallVantage Service customers have more than one telephone number associated with their service. Although this letter refers to subscribers or customers, customer data are computed on a telephone number basis.

AT&T CallVantage customers have Enhanced 911 (E911) and less than 1% have Basic 911 (911). This latter category is limited to areas where only Basic 911 is offered by the public safety answering point (PSAP). The remaining 32% of customers are provided with Alternative 911 (A911) and will continue to be served with A911 on a "grandfathered" basis. Because AT&T has stopped accepting orders for new service in those areas not yet VoIP E911-enabled, only grandfathered customers are included in the estimate for customers with A911. Further, AT&T's "Heartbeat Solution" enables customers to obtain proper 911 routing when they use AT&T CallVantage Service nomadically within AT&T's 911-capable footprint, and only enables service at locations where AT&T can provide 911 capabilities.⁵

AT&T expects to be providing E911 service to approximately 97% of its November 28, 2005 AT&T CallVantage customer base by third quarter 2006, but will still have approximately 3% of those subscribers who live in areas where AT&T will not at that time be capable of providing an E911 solution. AT&T is continuing to work internally and with external vendors to seek alternative technologies and solutions to reach 100% compliance as soon as possible.

Finally, per its commitment, AT&T is making monthly voluntary contributions to the Public Safety Foundation of America for all grandfathered AT&T CallVantage customers.

If you have any questions or need additional information, please do not hesitate to contact me.

Pursuant to section 1.1206 of the Commission's rules, this letter is being filed electronically with the Commission.

Sincerely,

/s/

Jack Zinman

cc: Daniel Gonzalez
Michelle Carey
Thomas Navin
Kathryn Berthot
Janice Myles

⁵ AT&T's technical solution for nomadic subscribers was described in detail in its October 7, 2005 *ex parte*.